

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtor.

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO,

Debtor.

PROMESA
Title III

Case No. 17-bk-03283 (LTS)

PROMESA
Title III

Case No. 17-cv-01685 (LTS)
Case No. 17-bk-03566 (LTS)

Re: ECF No. 367

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR THE HEARING ON APRIL 1, 2019 AT 2:30 P.M. AST**

Pursuant to this Court's Order [ECF No. 424 in Case No. 17-bk-03566], the parties intending to present argument at the April 1, 2019 hearing set for 2:30 p.m. Atlantic Standard Time have met and conferred concerning a proposed agenda for the sequence by which counsel intend to address the pending motions to compel, and respectfully submit the following proposed agenda:

- I. Movants' Motion to Compel Discovery [ECF No. 402 in Case No. 17-bk-03566]
- a. Motion to Compel ERS, the Commonwealth, and AAFAF to Search Within an Appropriate Date Range
 - i. Argument for Movants: Geoffrey S. Stewart
 - ii. Opposition Argument:
 - 1. The Commonwealth, ERS, and AAFAF: William J. Sushon
 - b. Motion to Compel Production of a Privilege Log
 - i. Argument for Movants: Matthew E. Papez
 - ii. Opposition Argument:
 - 1. The Commonwealth, ERS, and AAFAF: William J. Sushon
 - 2. Oversight Board: William D. Dalsen
 - c. Motion to Compel Oversight Board to Produce Documents
 - i. Argument for Movants: Sparkle L. Sooknanan
 - ii. Opposition Argument:
 - 1. Oversight Board: William D. Dalsen
 - d. Motion to Compel Oversight Board to Produce a Witness
 - i. Argument for Movants: Sparkle L. Sooknanan
 - ii. Opposition Argument:
 - 1. Oversight Board: William D. Dalsen
 - e. Motion to Compel the Commonwealth and ERS to Answer Interrogatories
 - i. Argument for Movants: Cheryl Tedeschi Sloane
 - ii. Opposition Argument:
 - 1. The Commonwealth, ERS, and AAFAF: William J. Sushon
- II. Oversight Board's Motion to Compel Discovery [ECF No. 403 in Case No. 17-bk-03566]
- a. Motion to Compel Responses to Interrogatory Nos. 5, 6, and 8, and Documents Responsive to Request No. 7
 - i. Oversight Board: William D. Dalsen
 - ii. Opposition Argument: Cheryl Tedeschi Sloane

- b. Motion to Compel Response to Interrogatory No. 9
 - i. Oversight Board: William D. Dalsen
 - ii. Opposition Argument: Cheryl Tedeschi Sloane
- c. Statements by the Committees
 - i. UCC: Nicholas Bassett
 - ii. Retiree Committee: Landon Raiford

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Dated: April 1, 2019
New York, NY

Respectfully submitted,

/s/ Margaret A. Dale

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

Jeffrey W. Levitan (*pro hac vice*)

Margaret A. Dale (*pro hac vice*)

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*Attorneys for the Financial Oversight and
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representative of the Employees Retirement
System of the Government of the
Commonwealth of Puerto Rico*

CERTIFICATE OF SERVICE

I hereby certify that, on April 1, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Luis F. del Valle-Emmanuelli
Luis F. del Valle-Emmanuelli